

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

VERY REVEREND GEORGES F. de LAIRE,
J.C.L.,

Plaintiff,

v.

GARY MICHAEL VORIS, ANITA CAREY,
ST. MICHAEL'S MEDIA a/k/a CHURCH
MILITANT, and MARC BALESTRIERI

Defendants.

CIVIL ACTION NO. 1:21-cv-00131-JL

**STIPULATION BETWEEN PLAINTIFF FATHER GEORGES DE LAIRE
AND DEFENDANT ANITA CAREY**

The plaintiff, Father Georges de Laire ("Father de Laire"), and the defendant, Anita Carey ("Ms. Carey") each for their own reasons, hereby stipulate and agree as follows:

1. Ms. Carey is dismissed as a defendant in this lawsuit by Father de Laire, with each party to bear his own attorneys' fees and costs, and with rights of appeal, if any, waived by Ms. Carey.
2. Ms. Carey also stipulates and agrees that the following statements are true:
 - i. From approximately March 2017 through November 2019, Ms. Carey worked as a staff writer at Defendant St. Michael's Media which publishes world-wide via the Internet as Church Militant ("Church Militant").
 - ii. Ms. Carey authored the June 25, 2019 article at issue in this case titled **"NH Diocese Violates Parishioners' Rights to Demolish Church"** ("the June 25th Article"). The June 25th Article contained the following statements about Father de Laire:

- a. “Priests and laity who currently work with him in the diocese say that Father de Laire is a vindictive and manipulative clericalist who pines to be named a bishop or an official of the Congregation for the Doctrine of the Faith.”
 - b. “At least three complaints against de Laire have been filed with the Holy See that together allege corruption, abuse of office, grave violations of the law and incompetence as a canonist. One of those complaints warned that under no circumstances should de Laire be named a bishop.”
 - c. “Church Militant also learned that de Laire has been outsourcing his canon law work he was hired to do. Priests and laity working with him say he is manipulative and vindictive and is a careerist – hoping to be appointed to a Vatican post or named bishop.”
- iii. At the time she wrote these statements, Ms. Carey assumed they were true because they had appeared in a prior Church Militant story published on January 17, 2019 titled “**NH Vicar Changes Dogma Into Heresy**” (“the January 17th Article”).
- iv. When Ms. Carey submitted the June 25th Article to her editor, she was instructed to add the statements from the prior article published in Church Militant.
- v. When Ms. Carey incorporated the statements into the June 25th Article, she relied solely on the prior publication of those statements by Church Militant in the January 17th Article.
- vi. The January 17th Article named no author and was published under the Church Militant byline.

vii. Because of the Church Militant byline in the January 17th Article, at the time Ms. Carey authored the June 25th Article, she believed that Michael Voris at Church Militant had in fact authored that the January 17th Article and she assumed that the unnamed sources referenced in the January 17th Article actually existed and had been confirmed by Michael Voris to exist.

viii. During this lawsuit, Ms. Carey learned for the first time that Marc Balestrieri (“Mr. Balestrieri”), a defendant in this case who has been defaulted, was the author of the January 17th Article.

ix. As of that date, Mr. Balestrieri was serving as a canon lawyer to the Saint Benedict Center, the party which had received the January 7, 2019 Precepts signed by Father de Laire.

x. This caused Ms. Carey to believe that Mr. Balestrieri had both a personal and financial interest to write something negative about Father de Laire and that he was a biased source.

xi. Neither Church Militant nor Defendant Michael Voris informed Ms. Carey of this information before she wrote the June 25th Article.

xii. Ms. Carey states that, had either of them done so, she would not have included the statements about Father de Laire in her June 25th Article.

xiii. During this lawsuit, Ms. Carey has learned that Mr. Balestrieri has been unwilling to appear in the case or attend his deposition and that he has been

unable or unwilling to name any alleged source for what he wrote in the January 17th Article, to the extent he authored it.

xiv. During this lawsuit, Ms. Carey has learned of Mr. Voris's threat to "rain down publicly" on Mr. Balestrieri if he testified that he was not the author of the January 17th Article.

xv. Ms. Carey has also learned that Mr. Voris lied for many years about his own personal matters.

xvi. As a former staff writer at Church Militant, Ms. Carey agrees that the statements about Father de Laire in the January 17th Article and the June 25th Article should never have been published.

xvii. Ms. Carey is committed to avoiding the sin of detraction, meaning that she would never cause injury to another person's reputation without good cause. Ms. Carey admits that there existed no good cause to make the false and defamatory statements of and concerning Father de Laire.

xviii. Ms. Carey believes that she herself acted neither recklessly nor maliciously when she wrote her article because she lacked the information which has come out during this lawsuit.

xix. Ms. Carey apologizes to Father de Laire and has asked for his forgiveness.

3. As part of this stipulation, Ms. Carey, through her counsel, has agreed to accept service of a trial subpoena and has agreed to appear and testify live at the trial of this matter during Father de Laire's case.

SO ORDERED THIS ____ DAY OF FEBRUARY, 2024.

(LaPlante, J. USDC NH)

<p>Respectfully submitted,</p> <p>THE VERY REVEREND GEORGES F. DE LAIRE</p> <p>By his attorneys:</p> <p><u>/s/ Howard M. Cooper</u> <u>/s/ Joseph M. Cacace</u> Howard M. Cooper, <i>pro hac vice</i> Joseph M. Cacace, N.H. Bar # 266082 TODD & WELD LLP One Federal Street, 27th Floor Boston, MA 02110 (617) 720-2626 jcacace@toddweld.com hcooper@toddweld.com</p> <p><u>/s/ Suzanne M. Elovecky</u> Suzanne M. Elovecky, <i>pro hac vice</i> PARTRIDGE SNOW & HAHN, LLP 30 Federal Street Boston, MA 02110 (617) 292-7900 selovecky@psh.com</p>	<p>ANITA CAREY</p> <p>By her attorney:</p> <p><u>/s/ Mark F. Sullivan</u> Mark F. Sullivan SULLIVAN LAW FIRM 27 Front Street Exeter, NH 03833 (603) 778-8183 exeterlaw@aol.com</p>
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CERTIFICATE OF SERVICE

I hereby certify that on February 19, 2024, I electronically filed the above document(s) with the Clerk of the Court using the ECF system, which will send notification of such filing to those who are currently on the list to receive e-mail notices for this case, and I will serve those not registered to received ECF notifications by e-mail and first class mail.

/s/ Joseph M. Cacace
Joseph M. Cacace